

QUIN DENVIR, Bar #49374
Federal Defender
DENNIS S. WAKS, Bar #142581
Supervising Assistant Federal Defender
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Attorney for Defendant
CARRIE MARIE SULAK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR. S-04-0218 MCE
)	
Plaintiff,)	
)	STIPULATION AND {PROPOSED} ORDER
v.)	
)	
CARRIE MARIE SULAK, et al.)	Date: October 25, 2005
)	Time: 8:30 a.m.
Defendants.)	Judge: Hon. Morrison C. England
)	
_____)	

It is hereby stipulated and agreed to between the United States of America through Phil Ferrari, Assistant U.S. Attorney; defendant, CARRIE MARIE SULAK, by and through her counsel, Dennis S. Waks, Supervising Assistant Federal Defender; and defendant, JOSEPH W. MCALLISTER, by and through his counsel, William J. Portanova, that the status conference of October 4, 2005 be vacated and a further status conference be set for October 25, 2005 at 8:30 a.m.

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1 This continuance is being requested because defense counsel
2 requires additional time to obtain discovery, continue our
3 investigation, and to interview our clients and other witnesses.
4 Furthermore, the parties are negotiating a plea agreement and need time
5 to reduce it to writing and provide it to the Court. Both Defense
6 counsel need time to discuss the plea with the prosecutor and with the
7 defendants.

8 Speedy trial time is to be excluded from the date of this order
9 through the date of the status conference set for October 25, 2005,
10 pursuant to 18 U.S.C. § 3161(h) (8) (B) (iv) and Local Code T4 based upon
11 continuity of counsel and defense preparation.

12 Dated: September 30, 2005

Respectfully submitted,

QUIN DENVIR
Federal Defender

/s/ Dennis S. Waks

DENNIS S. WAKS
Supervising Assistant Federal
Defender
Attorney for Defendant
CARRIE MARIE SULAK

/s/ Dennis S. Waks for

WILLIAM J. PORTANOVA
Attorney for Defendant

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JOSEPH W. MCALLISTER

Dated: September 30, 2005

MCGREGOR W. SCOTT
United States Attorney


/s/ Dennis S. Waks for

PHIL FERRARI
Assistant U.S. Attorney

O R D E R

IT IS SO ORDERED.

Dated: October 6, 2005



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE